

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NORTH DAKOTA  
WESTERN DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	Criminal No. 1:20-CR-75
	)	
vs.	)	
	)	<b>DEFENDANT'S MOTION</b>
KAYLA RENEE KEYES,	)	<b>FOR RECONSIDERATION</b>
	)	<b>OF DETENTION</b>
Defendant.	)	

COMES NOW the Defendant, Kayla Keyes, by and through her attorney, Ronald K. Hettich, Hettich Law Firm, PLLC, 112 University Drive N., Suite 323, Fargo, ND 58102, hereby moves this Honorable Court for an Order as follows:

1. Ms. Keyes had previously been ordered to be detained in this case.
2. At the time she was detained, she had a pending revocation matter before the Court as well. At least that part of the situation has changed since her previous request to attend treatment. The revocation matter has now been completely resolved.
3. Ms. Keyes has also found a treatment facility within North Dakota that she can attend.
4. Ms. Keyes has been accepted for treatment at the Prairie Recovery Center. The facility is in Raleigh, North Dakota. Defense Counsel has been speaking with Stephanie at Prairie Recovery Center regarding admission to the program.

5. Stephanie indicated that there is a space open immediately for Ms. Keyes, and she has been accepted into the program. The facility requires a physical, a current Covid-19 test, and a TB test prior to admission for treatment.
6. Defense Counsel has been in contact with the jail regarding these requirements
7. Ms. Keyes is currently detained at the McLean County Jail in Washburn, North Dakota. The jail indicated that it would get the required tests and physical if the Court ordered it. Ms. Keyes respectfully requests that the Court issue an order that the jail complete the Covid-19 test, TB test, and physical as part of its order allowing Ms. Keyes to attend treatment.
8. Defense Counsel has also been in contact with Rick Volk and the pretrial services officer assigned to the case. Both have indicated that they have no objection to Ms. Keyes being released for treatment at Prairie Recovery Center.
9. Ms. Keyes indicated that her father, Brian Keyes, could transport her to the treatment facility if the US Marshals are not able to do so in the near future. Brian resides in Minot, and he is willing and able to provide transportation for Ms. Keyes. Brian does not have a criminal record.
10. If the Court requires any other information, the Pretrial Services Officer can contact Defense Counsel.
11. Ms. Keyes has insurance that will cover the cost.
12. Mr. Keyes is asking the Court to reconsider the issue of detention and allow her to attend the treatment program as outlined above.

Dated this 3<sup>rd</sup> day of August, 2020.

**HETTICH LAW FIRM, PLLC**

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